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Samuel R. Bailey

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

BANK OF AMERICA, N.A.,

Plaintiffs,

vs.

SAMUEL R. BAILEY, et al.,

Defendants.

Case No.: 2:14-cv-885-JCM-GWF

**STIPULATION AND ORDER**

SAMUEL R. BAILEY, an individual,

Counterclaimant,

vs.

BANK OF AMERICA, N.A.; WESTCOR  
LAND TITLE INSURANCE COMPANY, a  
Florida corporation; and NEVADA TITLE  
COMPANY, a Nevada corporation,

Counterdefendants.

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**STIPULATION AND ORDER**

Defendant/Counterclaimant Samuel R. Bailey (“Bailey”) by and through the law firm of Schwartz Flansburg PLLC, and Plaintiff/Counterdefendant Bank of America, N.A. (BoFA), by and through the law firm of Holley Driggs Walch Fine Wray Puzey & Thompson (Bailey and BoFA collectively “Parties”), hereby stipulate and agree as follows:

1. The Parties stipulated to new deadlines on August 5, 2016 (Document No. 64).
2. Thereafter, the Parties attended a Mediation at which some of the claims were resolved.
3. Between Plaintiff/Counterdefendant Bank of America, N.A. and Defendant/Counterclaimant Samuel R. Bailey, the case was not resolved.
4. Following the Mediation, Defendant/Counterclaimant Samuel R. Bailey took the deposition of the 30(b)(6) designee for Plaintiff/Counterdefendant Bank of America, N.A. The date for the 30(b)(6) deposition had been set prior to Mediation and was set forth and contemplated in the August 5, 2016 discovery stipulation (Document 64).
5. The Parties are working together to determine whether any additional discovery may be produced following the deposition and may lead to a potential discovery motion.
6. Because the deposition transcript was received on October 6, 2016, the Parties have agreed to extend the time for which to file any discovery motions only. This extension will change the deadline for discovery motions from October 7, 2016 to October 14, 2016.

IT IS SO STIPULATED.

Dated this 7<sup>th</sup> day of October, 2016.

Dated this 7<sup>th</sup> day of October, 2016.

SCHWARTZ FLANSBURG

HOLLEY DRIGGS WALCH FINE WRAY  
PUZEY & THOMPSON

By: /s/ Frank M. Flansburg III  
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By: /s/ Rachel E. Donn  
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Attorneys for Plaintiff/Counterdefendant  
Bank of America, N.A

1 Dated this 7<sup>th</sup> day of October, 2016.

2 AKERMAN LLP

3  
4 By: /s/ Darren T. Brenner  
5 Darren T. Brenner, Esq.  
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8 Las Vegas, Nevada 89144  
9 Associate Counsel for  
10 Plaintiff/Counterdefendant  
11 Bank of America, N.A.

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13 **ORDER**

14 Based upon the foregoing, it is hereby ordered that the time to file any discovery motions  
15 be extended from October 7, 2016 to October 14, 2016.

16 Dated this 14 day of October, 2016.

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19 UNITED STATES MAGISTRATE JUDGE

20 Submitted By:

21 SCHWARTZ FLANSBURG PLLC

22 /s/ Frank M. Flansburg III  
23 Frank M. Flansburg III, Esq.  
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